

PFAS-SPECIFIC SUBSTANTIALLY IDENTICAL DISCHARGE GUIDANCE

This guidance document is intended to help facilities determine if two or more discharge points drain substantially identical areas for the purpose of requesting a reduction in monitoring frequency of Per- and Polyfluoroalkyl Substances (PFAS). This is relevant for facilities investigating sources of PFAS, typically as part of a formal Order with Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Water Resources Division (WRD). Criteria for determining substantially identical discharge points is derived from the [United States Environmental Protection Agency's Industrial Stormwater Monitoring and Sampling Guide](#). This guidance can be used to request a reduction in monitoring frequency between two or more discharge points for ongoing monitoring of storm water discharges as part of a compliance program to address PFAS discharges and is not meant for standard permit compliance. A reduced monitoring request may be submitted for approval by EGLE for a facility only if one of the three following conditions are met:

1. The facility provides documentation demonstrating that a discharge from a discharge point has been eliminated.
2. Four consecutive quarters of sampling data are submitted demonstrating that the facility is and has been discharging storm water in compliance with the applicable criteria at a discharge point.
3. When two or more discharge points are determined to be discharging substantially identical wastewater, the facility may request to reduce monitoring of the identified discharge points with an equally rotating schedule. This determination should be based on similarities of the general industrial activities and control measures located within the respective drainage areas, including exposed materials and equipment that may significantly contribute pollutants to storm water.
 - a. Consideration of similarities between drainage area surface materials (e.g., roof, pavement, gravel, grass, etc.) should also be factored into the determination.

The following figure provides an example of an industrial facility that may qualify for a reduction in monitoring based on two or more discharge points determined to be substantially identical.

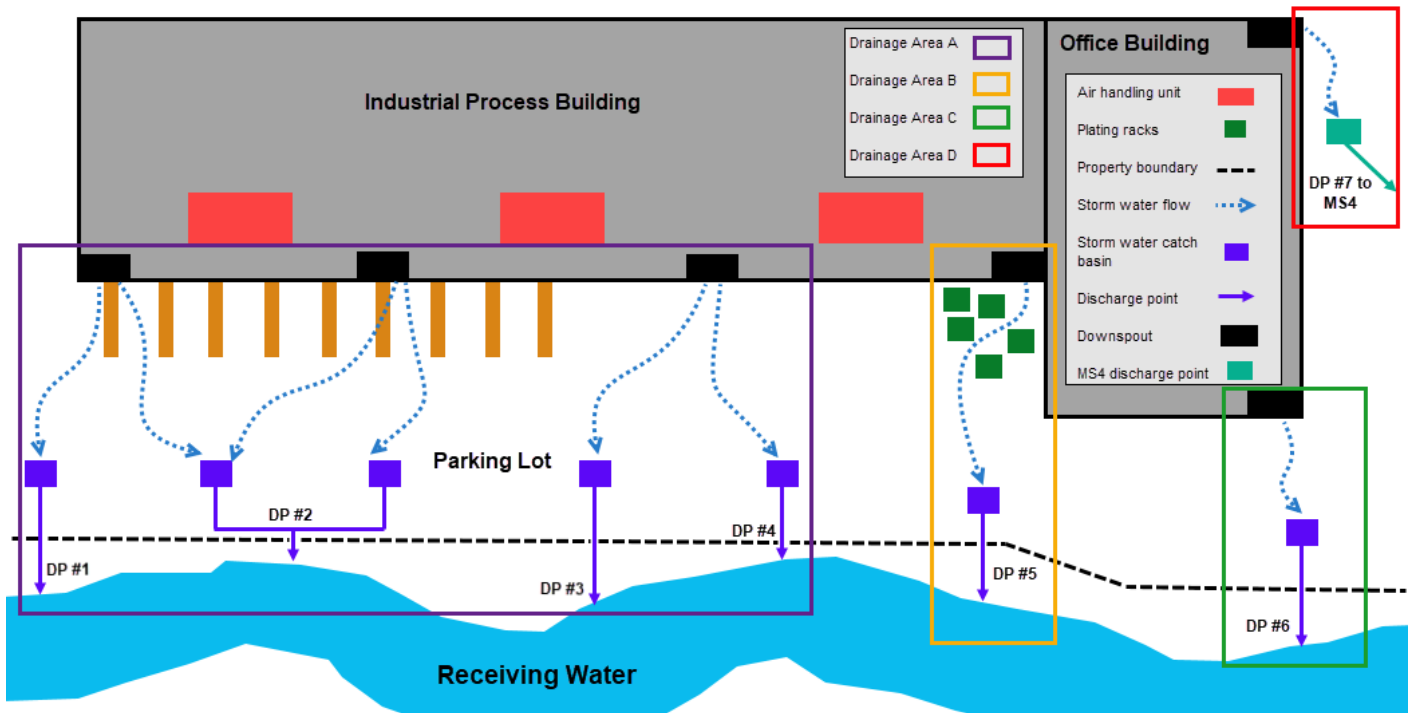


Figure 1. (DP denotes Discharge Point)

The example provided in Figure 1 is of a chrome plating facility that historically utilized mist suppressants containing perfluorooctane sulfonate (PFOS) as part of their industrial process. The facility has a total of seven storm water discharge points that - for explanatory purposes - have been grouped into four drainage areas, including discharges to both a local stream and a municipal separate storm sewer system (MS4).

Drainage Areas A and B are responsible for draining the areas of the industrial process building roof where three separate air handling units are located. The air handling units exhaust air from a portion of the industrial process building that may have historically been contaminated by PFOS from PFOS-based mist suppressants and deposited onto the roof. During rain events, storm water drains from the industrially impacted roof to the roof drains then to separate catch basins located in the parking lot. The impacted storm water from these areas then discharges into the local stream.

In total, storm water runoff **from the area containing the air handling units** is discharged through five separate discharge points from the facility. The four discharge points located in Drainage Area A may be determined by EGLE to be substantially identical and qualify for a reduction in monitoring as part of the PFAS compliance program. Drainage Area B, however, would not qualify as substantially identical to Drainage Area A because it drains storm water runoff impacted by roof air handling units **and** by chrome plating racks that are stored outside. Because of the additional exposure of the plating racks, Drainage Area B is **not** substantially identical Drainage Area A.

Drainage Area C drains the office portion of the facility. Therefore, Drainage Area C is **not** substantially identical to either Drainage Area A or Drainage Area B. However, Drainage Area D may be substantially identical to Drainage Area C, despite it discharging to the MS4 instead of to the local stream. Because both Drainage Areas C & D have similar industrial activities, exposed equipment, and surface materials, they may qualify for a reduction in monitoring between the two areas.

This hypothetical scenario may allow for a reduction in monitoring with three separate groupings of substantially identical discharge points as part of a monitoring reduction request to EGLE:

- Drainage Area A containing discharge points 1 - 4
- Drainage Area B containing discharge point 5
- Drainage Areas C & D containing discharge points 6 and 7

Each facility is different and may have different industrial operations or layout but may still qualify for a reduction in monitoring. Please contact your [Emerging Pollutants Section staff person](#) with questions.

The requirement to conduct monitoring may be in a formal communication from the WRD or contained in a legally enforceable Order, entered into by the property owner or operator responsible for the discharges of PFAS from the property and the WRD.

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